

VIA ECF

November 17, 2021

Hon. Lorna G. Schofield, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Edelman v. NYU Langone Health System, et al.*
Case No. 1:21-cv-00502 (LGS) (GWG)

Dear Judge Schofield:

The parties write jointly pursuant to the Third Amended Civil Case Management Plan and Scheduling Order (Doc. 64) (“CMP”) and the Memo Endorsement (Doc. 66) directing the parties to file a proposed schedule for expert depositions. Based on Plaintiff’s alleged damages, Defendants subpoenaed records from a third party to determine whether a medical expert was necessary. Defendants’ counsel has not yet received the subpoenaed records. Defendants’ counsel is reaching out to the subpoenaed party regarding those records. In light of that, Defendants respectfully request an extension from the November 17, 2021, deadline to and including December 1, 2021, to determine whether an expert witness will be necessary. Once Defendants have received the necessary records, Defendants will be in the position to determine whether to retain an expert.

This is Defendants’ first request for an extension of this deadline. Plaintiff consents to this extension.

While Plaintiff currently does not anticipate having an expert, she is considering same and intends to meet the applicable deadline for the disclosure of any expert.

The parties thank this Court for its time, attention, and consideration in this case.

Respectfully submitted,

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